

EXHIBIT “C”

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ALEX HOLMES, et al.,

PLAINTIFF,

-against-

Case No.:

1 : 20 - cv - 04448 - LJL

CHEM MINING CO., LLC, et al.,

DEFENDANTS.

-----X

DATE: March 4, 2022

TIME: 11:35 A.M.

CONTINUED DEPOSITION of the
Defendant, CHEM STOJANOVICH, taken by the
Plaintiff, pursuant to an Order and to the
Federal Rules of Civil Procedure, held at
the offices of Veritext Legal Solutions, 7
Times Square, 16th floor, New York New
York, before Cathy Leone via Veritext
Virtual Zoom, a Notary Public of the State
of New York.

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2 A P P E A R A N C E S:

3

4 E. STEWART JONES HACKER MURPHY LAW OFFICE

5 Attorneys for the Plaintiff

6 ALEX HOLMES, et al.

7 200 Harborside Drive, Suite 300

8 Schenectady, New York 12305

9 BY: JOHN HARWICK

10 jharwic@joneshacker.com

11 CHET STOJANOVICH, Pro-Se Litigant

12 ALSO PRESENT:

13 VERITEXT LEGAL SOLUTIONS

14 BY: MATTHEW CHIN-QUEE, Videographer

15

16 NICO DRAMONTANI

17 ALEX HOLMES

18

19 * * *

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Page 3

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2 F E D E R A L S T I P U L A T I O N S

3

4

5 IT IS HEREBY STIPULATED AND AGREED by and
6 between the counsel for the respective
7 parties herein that the sealing, filing and
8 certification of the within deposition be
9 waived; that the original of the deposition
10 may be signed and sworn to by the witness
11 before anyone authorized to administer an
12 oath, with the same effect as if signed
13 before a Judge of the Court; that an
14 unsigned copy of the deposition may be used
15 with the same force and effect as if signed
16 by the witness, 30 days after service of
17 the original & 1 copy of same upon counsel
18 for the witness.

19

20 IT IS FURTHER STIPULATED AND AGREED that
21 all objections except as to form, are
22 reserved to the time of trial.

23

24 * * * *

25

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1 C. STOJANOVICH

2 The attorneys participating in
3 this deposition acknowledge that the
4 Court Reporter is not physically
5 present in the deposition room and
6 that the Court Reporter will be
7 reporting this deposition remotely.

8 They further acknowledge that
9 in lieu of an oath administered in
10 person, the Court Reporter will
11 administer the oath remotely.

12 The parties and their counsel
13 consent to this arrangement and waive
14 any objections to this manner of
15 reporting.

16 THE VIDEOGRAPHER: Good
17 morning. We are going on the record
18 at 11:35 a.m. on March 4, 2022. This
19 is Media Unit 1 of the deposition of
20 Chet Stojanovich in the matter of
21 Alex Holmes v Chet Mining Company
22 LLC, et al. in the United States
23 District Court, Southern District of
24 New York, No. 20-CV-4448.

25 The deposition is being held at

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2 Veritext located at 7 Times Square,
3 New York, New York.

4 My name is Matthew Chin-Quee
5 from the firm Veritext and I am the
6 videographer. The court reporter is
7 Cathy Leone from Veritext.

8 Will counsel please introduce
9 yourself?

10 MR. HARWICK: John F. Harwick,
11 E. Stewart Jones Hacker Murphy for
12 the plaintiffs and judgment
13 creditors, Alex Holmes, et al.

14 THE VIDEOGRAPHER: Will the
15 court reporter please swear in the
16 witness?

17 C H E T S T O J A N O V I C H, called as
18 a witness, having been first duly sworn by
19 a Notary Public of the State of New York,
20 was examined and testified as follows:

21 EXAMINATION BY

22 MR. HARWICK:

23 Q. Mr. Stojanovich, as you know,
24 my name is John Harwick. I represent a
25 group of individuals that have judgments

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2 against you, federal court judgments
3 arising out of a lawsuit that was brought
4 against you in the Southern District of New
5 York with regard to your theft of their
6 funds after promising bitcoin mining
7 equipment and mining services. This is a
8 continuation of your deposition after we
9 made a motion for contempt and you are here
10 under court order.

11 Do you understand that?

12 A. What you first said. I don't
13 entirely understand the second part. The
14 court order I understand.

15 Q. You understand that we had a
16 conference with the judge and the judge
17 ordered you to appear in person today in
18 Manhattan?

19 A. Right.

20 Q. Thank you for appearing.

21 The judge also ordered you to
22 search your records and disclose the
23 various documents that were subpoenaed by
24 me and also demanded at your last
25 deposition in this case. Have you

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2 delivered those documents to me as of
3 today?

4 A. I sent you an e-mail very
5 recently asking you if there is anything
6 else that you additionally needed. I sent
7 you three e-mails actually.

8 Q. For the record, I don't have
9 any of the document responses to the
10 subpoena that we served and I don't have
11 any of the documents --

12 A. Okay --

13 Q. You have to let me talk. We
14 can't both talk at the same time.
15 Otherwise, we will be here all day.

16 A. Go ahead.

17 Q. For the record, I want to put
18 on the record that I have not received
19 documents in electronic format that are
20 responsive to the subpoena. I have not
21 received documents in electronic or other
22 format that are responsive to the demands
23 that were made at your last deposition and
24 that the court ordered you to produce, so
25 we will be moving forward with the contempt

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2 proceeding against you. We will be asking
3 the judge for an order directing the United
4 States Marshal to place you under arrest
5 until such time that we do receive all of
6 the documentation that was called for by
7 the subpoena that was served upon you and
8 for the documentation that was requested at
9 the last deposition in this case where you
10 appeared and I put various demands on the
11 record, so I just wanted to make that
12 clear.

13 Are you represented by counsel
14 today?

15 A. I don't have a counselor today
16 at the deposition. They said that a
17 counselor could be present, but getting
18 here was very difficult. I wasn't sure if
19 I was going to be able to make it
20 physically.

21 Q. What is your legal name,
22 Mr. Stojanovich?

23 A. Chet Stojanovich.

24 Q. What's the name that appears on
25 your birth certificate?

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1 C. STOJANOVICH

2 A. Chet Stojanovich.

3 Q. Is it Chester or Chet?

4 A. Chet Stojanovich.

5 Q. Is your legal name Chester
6 Stojanovich?

7 A. No. It is Chet Stojanovich.

8 Q. Is there another Chester
9 Stojanovich in your family?

10 A. Yes.

11 Q. Who is that?

12 A. My grandfather has the named
13 Chester and I believe my cousin, as well.
14 I'm not very close with my family.

15 Q. Do you have a bank account at
16 Morgan Stanley?

17 A. I do. I got a bank account
18 there and it wasn't really open and
19 activated, I think, until late September.
20 I don't know. I wasn't funded at all until
21 November.

22 Q. What's your affiliation with
23 the company called Phoenix Data?

24 A. Phoenix Data is a company that
25 I was working with for a few months.

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1 C. STOJANOVICH

2 Q. Are you an owner of Phoenix
3 Data?

4 A. I do have shares. I don't know
5 what the exact holdings are.

6 Q. What is the legal name of that
7 entity?

8 A. Phoenix Data.

9 Q. Phoenix Data?

10 A. I think so.

11 Q. Is that an LLC or an Inc.?

12 A. I don't know. I would have to
13 look up that. That's outside of my
14 purview.

15 Q. Who are the other partners?

16 A. I don't know who is listed on
17 it. The filing wasn't done by me.

18 Q. Who was the filing done by?

19 A. I think it was done by SWIFT.

20 Q. Is that an individual?

21 A. No. It is a company.

22 Q. Are you the sole member of
23 Phoenix Data?

24 A. I don't know how it was
25 incorporated, who was the shareholders and

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2 where.

3 Q. It has a website though,
4 correct?

5 A. I don't think so anymore.

6 Q. What's your girlfriend's name?

7 A. I don't have a girlfriend. I
8 have a fiancée.

9 Q. What is your fiancée's name?

10 A. Tamsan, T-A-M-S-A-N.

11 Q. What is her last name?

12 A. Measroch.

13 Q. Spell that.

14 A. M-E-A-S-R-O-C-H.

15 Q. What's your date of birth?

16 A. I am drawing a blank right now.
17 January 30, I believe, '89.

18 Q. January 30, 1989; is that
19 correct?

20 A. That's correct.

21 Q. What's your phone number?

22 A. I don't have my phone with me.
23 I don't memorize numbers.

24 Q. You didn't bring your phone
25 with you today?

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1 C. STOJANOVICH

2 A. No.

3 Q. Where is your phone?

4 A. I think it is either in the car
5 or it is in storage.

6 Q. How did you get to today's
7 deposition?

8 A. What?

9 Q. How did you get to today's
10 deposition?

11 A. I got down here via a vehicle,
12 a car.

13 Q. Whose vehicle?

14 A. It was a rental vehicle that I
15 was able to get at the last minute.

16 Q. Where did you rent the vehicle
17 from?

18 A. I don't know the rental
19 company. I could look it up if you would
20 like.

21 Q. Go ahead. Did you bring an
22 iPad, a computer or anything with you
23 today?

24 A. No, I didn't.

25 Q. Did you bring any hard drives

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2 with you today?

3 A. I don't have any hard drives.
4 The hard drive that you asked about before,
5 when I went to go look for it, I didn't
6 have it, so I don't have anymore backup
7 drives, so that's kind of the difficulty
8 when I first brought that up with you. I
9 told you that I would look for it when I
10 couldn't find it. It was -- it has been
11 gone, so I haven't got a replacement drive
12 because I don't have a lot of data to back
13 up anymore.

14 Q. Where does your girlfriend
15 live?

16 A. My girlfriend is -- I don't
17 have a girlfriend, like I said before. I
18 have a fiancée and she lives in -- she
19 lives in New York most of the time, but she
20 has been in California.

21 Q. What's her address?

22 A. I don't have her contact
23 details or information.

24 Q. You don't know your fiancée's
25 address? You realize that you are

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2 **testifying under oath?**

3 A. I don't have her address
4 registered. She stayed with me at my old
5 apartment and since we have been between
6 places, it is kind of a new thing, so --

7 Q. Is it your testimony under oath
8 today, and this testimony is going to be
9 shared with the federal court judge, that
10 you don't know your fiancée's address?

11 A. Off the top of my head, I
12 don't. I could look it up. Like I said
13 before, I don't memorize these things. I
14 basically have it stored in my phone or
15 written down in a book or something, that
16 is kind of like an address book, but I
17 don't memorize that stuff.

18 Q. Do you live with your fiancée?

19 A. I did, yeah. Right now, I am
20 in between places, so it is kind of a
21 difficult thing.

22 Q. When did you get engaged to
23 your fiancée?

24 A. Last year.

25 Q. What's your current address?

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2 A. I am between places right now,
3 so I don't have a permanent address yet.

4 Q. What's your temporary address?

5 A. The last place I stayed at, I
6 believe, was 4545 Park Avenue. I can pull
7 up -- the record is downstairs. I can go
8 and see what it is because I'm in between
9 places. I don't have a standalone address
10 right now. I have been using digital
11 e-mail for any kind of communications and
12 storing everything at the postal office.

13 Q. What's your e-mail address?

14 A. My e-mail address -- I just
15 e-mailed you a little bit ago. It is
16 Chetchet11.

17 Q. What's your phone number?

18 A. 310-824-3903.

19 Q. What provider do you use for
20 phone service?

21 A. Verizon. I'm trying to switch
22 over to a better provider, but Verizon is
23 what I got right now.

24 Q. What are your sources of
25 income?

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2 A. Right now I am still sorting
3 that out.

4 Q. Do you have any source of
5 income?

6 A. Not right now, not at this very
7 moment.

8 Q. Did you retain counsel in
9 California?

10 A. Yes.

11 Q. How did you pay them?

12 A. That was before I moved. When
13 I lost my space, it changed what it was.
14 Before that was paid through a deposit.

15 Q. Right. From what source?

16 A. Just from revenue from the
17 business that I was running.

18 Q. Was it from a bank account?

19 A. Yes.

20 Q. Okay. What bank account?

21 A. I think that it was -- now, I'm
22 not positive, but I think this was done
23 through my Capital One, but I'm not
24 positive on that. It was quite a while
25 ago. It was almost six months ago, so it

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2 was kind of hard to remember how that was
3 transferred.

4 Q. Was it paid by wire or by
5 check?

6 A. I think it was actually -- I
7 think it was -- six months ago I think I
8 actually used my credit card that I had at
9 the time that I don't have right now.
10 Again, I think I had a credit card that I
11 used at the time.

12 Q. Do you have your wallet with
13 you today?

14 A. No. I left everything
15 downstairs.

16 Q. Where downstairs?

17 A. I left everything, I think, in
18 the vehicle or it is either at the storage
19 location.

20 Q. Where is your storage location?

21 A. It is just one of those lockers
22 that you can get.

23 Q. Now you recently moved out of
24 Duane Street?

25 A. I wouldn't say recently. It

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2 has been some time. I have been
3 transitioning out of that place since
4 January.

5 Q. Did they pay you to leave?

6 A. They did.

7 Q. How much?

8 A. 2800.

9 Q. Where did you put that money?

10 A. I put that money -- I sent
11 money out and I put that money to
12 basically, you know, temporary space.

13 Q. Where did you put that money?
14 Did you put it in an account?

15 A. Yeah. I did a deposit and then
16 I did the withdrawal part. This is before.

17 Q. Where did you deposit the
18 money?

19 A. I think this was at RBC before
20 the account was closed.

21 Q. That's Royal Bank of Canada?

22 A. Yes. It was Royal Bank of
23 Canada. I think that's what it was --
24 yeah, Royal Bank of Canada.

25 Q. When did you open that account?

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2 A. December or -- December or
3 November. I'm not sure exactly, but it was
4 at the end of the year, after --

5 Q. Is that account closed or open?

6 A. All closed.

7 Q. What bank accounts do you have
8 now?

9 A. Right now, I just have my --
10 let's see. I have my Santander Bank right
11 now.

12 Q. How much money is in that
13 account?

14 A. I have \$30 in that account
15 right now, to the best of my knowledge. It
16 is still going through the opening process.

17 Q. Where did you fund that account
18 from?

19 A. Cash that I had. I had \$30, so
20 I put \$30 in.

21 Q. What other bank accounts do you
22 have?

23 A. I have -- I think I just -- I'm
24 waiting on an opening approval from another
25 account and I think Citizens is coming in,

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1 C. STOJANOVICH
2 but I have -- I'm trying to think.
3 Santander is the one that I have right now.
4 That's the main account that I have right
5 now. It is hard to find a bank. I don't
6 have Morgan Stanley to use and I don't have
7 Capital One.

8 Q. Why not?

9 A. Because you have a subpoena in
10 it, I think.

11 Q. Are those accounts frozen to
12 your knowledge?

13 A. Yes, they definitely are.

14 Q. Now, there is approximately 150
15 to \$175,000 in Phoenix Data's account at
16 Morgan Stanley, are you aware of that?

17 A. Yes. I sent you over the
18 statement for that account.

19 MR. HARWICK: For the record, I
20 did not receive that.

21 Q. When did you send that?

22 A. I sent it first on February
23 14th and I sent it again two days ago and I
24 sent it again today. You haven't received
25 any of those e-mails?

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1 C. STOJANOVICH

2 Q. No. What was the source of the
3 funds in the Morgan Stanley account for
4 Phoenix Data?

5 A. I would have to see. I think
6 it may have been a wire transfer for a
7 purchase that I don't know.

8 Q. Are you still in the
9 cryptocurrency business?

10 A. I am segueing out of that
11 completely.

12 Q. Are you still in the business
13 now?

14 A. Nope. I'm staying out of it
15 completely right now. I am focusing
16 predominantly on entertainment and I'm
17 looking at education as a focus.

18 Q. Do you own any cryptocurrency?

19 A. I think that my coin base which
20 is closed has about \$400 in cryptocurrency
21 in it, but I haven't got that sorted out
22 yet or why that's closed out or what the
23 issue is.

24 Q. Other than that, do you own any
25 other cryptocurrency?

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2 A. I may have a few random coins
3 from before, but I don't know where they
4 would be. I don't have -- my apartment had
5 a surge and basically fried all of my
6 systems and my two desktops in there are
7 fried and my laptop, that's fried.

8 Q. What does your fiancée do for a
9 living?

10 A. She is not working right now.

11 Q. Do you have a job?

12 A. That's what I'm working on
13 right now, kind of segueing over.

14 Q. Do you have any source of
15 income right now?

16 A. I answered that earlier.

17 Right now I don't have a source of income
18 or regular checks coming in.

19 Q. Do you have a safety deposit
20 box anywhere?

21 A. No, not that I know of.

22 Q. Do you have any brokerage
23 accounts?

24 A. Morgan Stanley is a brokerage
25 account, I believe.

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2 Q. Do you work with an advisor
3 there?

4 A. There is -- I don't know who my
5 advisor is now. There was -- what was it?
6 DV something or DV something or other that
7 was on there.

8 Q. Do you know a gentleman by the
9 name of Cunningham?

10 A. Cunningham? I don't know
11 anybody with the first name Cunningham.

12 Q. Do you know a gentleman by the
13 name of Troy Cunningham?

14 A. Troy works for Wattum,
15 W-A-T-T-U-M.

16 Q. Did you defraud Mr. Cunningham?

17 A. I am not going to go there.

18 Q. Are you aware there is a
19 pending lawsuit against you in the Southern
20 District brought by Mr. Cunningham?

21 A. I will talk to my counselors in
22 California about that.

23 Q. Are you receiving the e-mails
24 that I sent to your new e-mail address?

25 A. Chetchet11?

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2 Q. Yes.

3 A. I got an e-mail earlier. I
4 didn't get a response back.

5 Q. Was that e-mail from me?

6 A. Yeah.

7 Q. So that's a valid working
8 e-mail address; is that correct?

9 A. Excuse me?

10 A. Is that a valid working e-mail
11 address?

12 A. Yes, Chetchet1122@gmail.com and
13 Chetchet11.

14 Q. You can receive notices at that
15 e-mail; is that correct?

16 A. I don't know if that means
17 notices as in -- can you be specific or
18 clarify?

19 Q. Who is Paul Wu?

20 A. Paul Wu?

21 Q. Yes.

22 A. Paul Wu is a stuntman that
23 works up in Vancouver.

24 Q. Are you friends with him?

25 A. Yeah. He is a nice guy, a

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2 really good guy.

3 Q. Are you business associates
4 with him?

5 A. Not at this moment. We do talk
6 a lot, but -- we usually talk a lot. It
7 has been a little bit of time. He has been
8 very busy.

9 Q. What's his number?

10 A. I don't have my phone numbers,
11 as you well know.

12 Q. Where is your phone again
13 today? Is it down in your car?

14 A. I think it is in my car or in
15 the storage --

16 Q. Where did you park?

17 A. Somewhere within like three
18 blocks. I think it is on 44th, 45th --
19 maybe it is 47th. I don't know.

20 Q. How did you pay for parking?

21 A. I haven't paid for parking.

22 Q. How are you going to pay for
23 parking today when you leave?

24 A. I have cash on me.

25 Q. How much cash do you have on

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1 C. STOJANOVICH

2 you?

3 A. I don't know. I think I have
4 got 60 bucks in my pocket. I'm not sure,
5 maybe 65 or something. I think I have
6 three 20s in here, \$66, I think.

7 Q. Now, you rented a car, but it
8 is your testimony under oath today that you
9 don't know the name of the rental company?

10 A. I don't know. It is a very
11 small rental company like a remote rental
12 car company. It is not like Hertz or
13 Budget Or Enterprise or any of those
14 places.

15 Q. Where is it located?

16 A. It is located -- I think it is
17 located throughout the United States and
18 Canada. It is like one of those rideshare
19 kind of places, kind of like a Zipcar, but
20 much smaller than that company.

21 Q. Did you pay for that using a
22 credit card or did you have to put a
23 deposit down like a credit card?

24 A. No, I don't have a credit card,
25 like I said.

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1 C. STOJANOVICH

2 Q. You don't have any credit?

3 A. No.

4 Q. How did you pay for the rental?

5 A. That's one of those places that
6 let's you rent with a debit.

7 Q. What debit card did you use?

8 A. I honestly don't know. I would
9 have to go to the rental agreement and I
10 don't have that with me.

11 MR. HARWICK: We would request
12 a copy of the rental agreement and a
13 copy of the debit card that you used.

14 Q. Where is the debit card tied
15 to, what bank?

16 A. I am assuming it is in my
17 wallet. I don't have that on me right now.

18 Q. Where is your wallet?

19 A. Like I said before, I think it
20 is either in the car or in the storage
21 thing.

22 Q. Have you filed tax returns
23 within the last five years?

24 A. The lawyers are still working
25 that out.

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1 C. STOJANOVICH

2 Q. Have you filed tax returns
3 within the last five years?

4 A. I don't know. They are still
5 working that out. That's not my purview.
6 I don't do my taxes directly. I don't know
7 how to do them.

8 Q. Have you signed tax returns
9 within the last five years?

10 A. I sent them some paperwork, but
11 I don't have actual tax returns at my
12 disposal and I am waiting to here back how
13 it is going to work. We were operating at
14 a loss for three years.

15 Q. Have you filed a federal or
16 state personal tax return within the last
17 five years; yes or no?

18 A. I don't -- I honestly don't
19 know because I haven't talked to my
20 counselor about that. They are working
21 through that.

22 Q. Who is your counselor?

23 A. Mark. You know him very well.

24 Q. So it is your testimony that
25 Mark Riera is assisting you with your tax

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1 C. STOJANOVICH

2 returns?

3 A. The law firm is.

4 Q. The law firm is?

5 A. Yes, because we had -- it was a
6 complicated situation with my taxes
7 because --

8 Q. What's the complicated
9 situation?

10 A. The CPA before, the certified
11 public accountant before had passed away
12 prior to my filing and it was then brought
13 over to H&R in a desperate attempt to get
14 it sorted out, but they ended up losing all
15 of my paperwork, and I am still working
16 things out with my lawyers. It is
17 complicated. I don't fully understand it.
18 I am trying to, but they are giving me
19 guidance with that respect.

20 Q. What attorneys are you working
21 with at Mark Riera's firm on your tax
22 returns?

23 A. I have been talking to Bradford
24 Cohen a little bit on that side, but I
25 don't know exactly who is going to be doing

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1 C. STOJANOVICH

2 what in which capacity. The law firm
3 pretty much handles that as a company and
4 then they determine who handles exactly
5 which aspect of --

6 Q. How much of a retainer balance
7 do you have left at Mark Riera's firm?

8 A. I don't know.

9 Q. How much did you pay them up
10 front?

11 A. 30,000 so far, I think, maybe
12 more.

13 Q. Where did you get the money for
14 that, Chet?

15 A. The 30,000 was put on my credit
16 card before and that's how I was paying
17 him. I was putting 5,000 on at a time.

18 Q. Have any credit card companies
19 obtained judgments against you for unpaid
20 bills?

21 A. Not that I know of.

22 Q. What about American Express?

23 A. I haven't talked to American
24 Express about that, but the last I spoke to
25 American Express, I was trying to sort out

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1 C. STOJANOVICH

2 exactly what had happened. I paid them up.
3 To the best of my knowledge, I paid them up
4 and there was a credit due, but we are
5 still working on that.

6 Q. When you left your Duane Street
7 apartment, tell me exactly when you left
8 that apartment.

9 A. I don't know the exact date,
10 but I started segueing out of that place in
11 January.

12 Q. Were you being evicted from
13 that apartment?

14 A. We had a dispute and they had
15 four complaints that they removed from the
16 system.

17 Q. How much back rents do you owe
18 that landlord?

19 A. I don't.

20 Q. You owe them nothing?

21 A. We settled things.

22 Q. How much did you settle for?

23 A. They paid me 2800.

24 Q. When was the last time you paid
25 them rent before January 2022?

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2 A. January -- January through
3 April -- I'm not really sure, somewhere in
4 that time in 2020.

5 Q. In 2020?

6 A. Yeah.

7 Q. So you didn't pay rent for
8 approximately three-quarters of the better
9 part of the year; is that correct?

10 A. They rejected my payments for
11 rent, so it ended up being a point of
12 contention.

13 Q. What account were you trying to
14 pay them from?

15 A. I don't remember. That was
16 2020.

17 Q. The Royal Bank of Canada
18 account, is that frozen, to your knowledge?

19 A. No. That's closed.

20 Q. Okay. What companies, LLCs,
21 corporations, businesses do you have an
22 ownership interest in presently?

23 A. I honestly don't know. There
24 has been a lot of filings through the
25 years. I don't know what's open and what

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2 is closed. I would have to go and talk to
3 SWIFT, the company. I don't know how they
4 spell it. It is definitely not like the
5 typical way that you would spell the word
6 or maybe it is. I don't know. Everything
7 looks strange online.

8 Q. Now, at one point recently you
9 had offered to pay my clients in full for
10 their judgments; is that correct?

11 A. Yeah. We had a settlement
12 agreement in place and under the Section 55
13 or 52 or 56, around that area, we needed to
14 get a document from you guys to help
15 facilitate that inbound deposit to close
16 out the necessary funds to pay over to you
17 guys, but we were unable to find -- we
18 weren't able to get that documentation
19 signed and delivered to the bank so we
20 could do a deposit and settle up with your
21 clients, which I have wanting to do for
22 quite some time now. It is definitely
23 getting in the way of settlement and for
24 this to be completed. Unfortunately,
25 without that documentation it will be

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2 impossible to get the funds in and out too,
3 so it is a gating issue and it is
4 unfortunate because I don't want anybody to
5 have to wait longer than they do to get
6 their funds.

7 Q. So you have the money to pay
8 the judgments if you get this one document,
9 right?

10 A. If we are able to get this
11 document, then I should be able to get the
12 funds transferred in and then transferred
13 out.

14 Q. So I will ask you the question
15 again.

16 You have the money to pay the
17 judgments if you get this one document,
18 correct?

19 A. If we get the document settled
20 and they release the inbound and outbound
21 on the accounts, there shouldn't be any
22 issue. Although, it is becoming a gating
23 issue because it is risking the principal
24 because I can't get receivables in for
25 anything until that's done and the longer

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2 that goes on, the higher the risk is that I
3 won't get the funds at all.

4 Q. Let me ask you the question.

5 It is a yes or no question, okay?

6 You have the money to pay my
7 clients if you wanted so long as you get
8 one other document from them; is that
9 correct?

10 A. I should be able to transfer
11 all of the funds into the account once that
12 document lifts the hold. These holds have
13 been on there for some time and depending
14 on the bank right now, I don't know what
15 their policies are, but if this document is
16 done, I feel confident that we can get this
17 settled out.

18 Q. What document are you referring
19 to?

20 A. A document -- well, I think it
21 is a two-parter. The motion document is
22 part of it. The other part of it is the
23 release of the subpoena on the accounts.

24 Q. So you need your accounts
25 unfrozen; is that correct?

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2 A. Yes.

3 Q. What's the other document that
4 you need in order to pay my clients in
5 full?

6 A. Well, according to the
7 agreement that they had, the appeal of the
8 motion.

9 Q. I don't know what you are
10 talking about. What motion?

11 A. The motion for contempt. It is
12 also causing an issue because that's an
13 outstanding thing and it really does cause
14 issues with banks then they see that there
15 is a motion for contempt. They want to
16 stay away from stuff like that.

17 Q. Who told you that, Chet?

18 A. Virtually every banker that I
19 have spoken to.

20 Q. Who was the last banker that
21 you spoke to that said that the contempt
22 motion was an obstacle for you paying my
23 clients what you owe them?

24 A. That's not what they said.

25 They said it is an obstacle when banking

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2 with people.

3 Q. So if your accounts were
4 unfroze and we vacate the contempt motion
5 and/or abandon the contempt proceeding,
6 then you can pay my clients; is that
7 correct?

8 A. I feel confident it would go
9 through.

10 Q. Okay. Where are you going to
11 get the money from, Chet?

12 A. Well, there are a couple of
13 options that I have right now, but right
14 now I don't want to go into too much
15 without risking the actual principle by
16 talking without a public record, but there
17 is one option that I have right now that I
18 am confident that will go through and I
19 think we can go ahead and close that out.
20 There is a paid service that we have that
21 we would be able to go and extend and that
22 would cover the difference.

23 Q. I'm sorry, what was the last
24 part that you said?

25 A. That would cover the difference

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2 that's needed.

3 Q. So you have access to funds
4 somewhere; is that correct?

5 A. No. It is not that I'm sitting
6 on funds and not wanting to move forward.
7 It is that I have access to bring in
8 revenue which would cover the difference.

9 Q. How are you going to bring in
10 revenue to cover over a million dollars
11 worth of judgments?

12 A. There are services that a third
13 party has that's well established that I
14 can go ahead and provide and it is a nice
15 way to go ahead and get the services
16 provided for one party and also get the
17 funds for another party.

18 Q. You will have to explain that
19 to me because it sounds like you have
20 access to funds, but you are not paying
21 them over. I want to know who the third
22 party is and explain how you propose to pay
23 these judgments.

24 A. Simply we would provide
25 services to another person who would get

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2 that through an established first party,
3 somebody that is well known and respected
4 and trusted and they would go ahead and in
5 turn pay us the servicing fee and we would
6 out of our revenue profit base, after our
7 costs, would pay that amount to the
8 clients. It is not that complicated. It
9 is like revenue in any business. You are a
10 lawyer. You charge for that and you have
11 your fees and your hard costs and your
12 office. Once those are deducted, then the
13 rest of the fees go to a profit base and
14 anything after costs or costs incurred or
15 bills and so on would then go to what you
16 call your profit or what you report as your
17 profit and file with the IRS for taxes,
18 just like any business works and then you
19 provide the services and then you put the
20 profit in a separate account and utilize it
21 for whatever things you need to do.

22 Q. What services are you going to
23 provide that's going to be worth a million
24 dollars?

25 A. There are a lot of services

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2 that you could provide. Consultation
3 services. There are a few third-party
4 companies. They could provide valuable
5 hosting services and also provide access to
6 space. There is also media that you can do
7 from that standpoint, media encoding.
8 There is a lot of stuff that's out there
9 that can be really valuable, especially in
10 this day and age and right now there is a
11 great demand for it, so it is something
12 that takes times and it usually takes time.
13 We believe that it is going to move forward
14 very, very quickly, but that's what we
15 thought at the start of the month, but we
16 are still waiting on that.

17 Q. Do you have anything in the
18 works?

19 A. That's precisely what we are
20 trying to do right now.

21 Q. What do you mean by that?

22 A. That's precisely what we are
23 trying to finish right now.

24 Q. Have you reached out to
25 potential customers to provide services to

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2 them?

3 A. Customers have reached out to
4 us, but yeah.

5 Q. Is Troy Cunningham one of your
6 customers?

7 A. No. Troy is not one of my
8 customers right now. Troy and I had a bit
9 of a falling out and we are not doing any
10 business together right now.

11 Q. What business were you in
12 together?

13 A. Well, I was a customer at
14 Wattum.

15 Q. Can you spell that?

16 A. Yeah. I spelled it at the
17 beginning of the deposition. It is
18 W-A-T-T-U-M.

19 Q. What kind of company was that?

20 A. It is a hosting company. They
21 also do hardware resales.

22 Q. When were you last involved
23 with Wattum?

24 A. Well, I actually heard from
25 them the other day. I'm still waiting. It

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2 has been three and a half months for
3 services that I paid for that have been
4 rendered. I don't know what that's about,
5 but I inquired about it again. A lot of
6 the spaces here sometimes, you know, it is
7 hard to calculate electricity. People come
8 up short or they make mistakes and overbook
9 like a hotel does and that can lead to
10 outages of service or not enough vacancy,
11 if you will, and it is a pretty common
12 things that could happen with the locations
13 as opposed to level 3 data centers. Level
14 3 data centers don't make that mistake
15 usually.

16 Q. Does anybody owe you money?

17 A. Yeah, up north in Canada.

18 Q. Have you been to Canada lately?

19 A. I have. I was trying to settle
20 the money that I was owed for the very
21 purpose of the settlement.

22 Q. Where did you go in Canada?

23 A. I went up to or back to go to
24 Bitfarms and tried to get what we are owed
25 in terms of hardware and money.

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2 Q. What happened?

3 A. I'm still -- it has been a
4 lengthy process going back and forth with
5 them.

6 Q. Do you have any plans to move
7 to Canada?

8 A. Not right now.

9 Q. Did your fiancée tell Paul Wu
10 you were moving to Canada?

11 A. We are considering Montreal,
12 but it is not something we are going to do
13 right now. Maybe down the line, maybe in a
14 couple of months. Staying up there is
15 nice, but I do not like to leave New York.
16 Unfortunately, I don't have a lot of
17 options right now and until I find a place,
18 I will be going back and forth just to get
19 this settled out.

20 Q. When you leave here today,
21 where are you going to sleep tonight?

22 A. I'm not sure yet. I don't know
23 when I'm leaving yet and I don't know what
24 the timeline looks like.

25 Q. If you get out of here by 3:00,

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2 where are you going to go next?

3 A. I have to look it up. I have
4 to find it.

5 Q. You don't have a place to stay
6 tonight?

7 A. No because I don't know what my
8 day is going to be like with today's
9 deposition.

10 Q. Do you have an apartment
11 anywhere?

12 A. I mean unless you call hotels
13 apartments, but --

14 Q. I'm sorry?

15 A. Unless you call a hotel an
16 apartment.

17 Q. What hotel are you staying at?

18 A. Well, I'm saying I have stayed
19 at hotels, but they are not really
20 apartments.

21 Q. Do you have a hotel tonight?

22 A. No, I haven't booked it yet.

23 Q. Where did you come from today?

24 A. I came from upstate. You know
25 that. I was in upstate by Chestertown.

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2 Q. Where?

3 A. Upstate by Chestertown. I
4 don't know. There is not a lot out there.
5 You know that.

6 Q. Were you at somebody's house?

7 A. Nope.

8 Q. Were you at a hotel?

9 A. I was out there for a while
10 trying to get the -- my vehicle broke down
11 on Monday, which I notified John Harwick of
12 because I wanted to see if we could go
13 ahead and do this a little bit closer to
14 where I was while I was sorting through the
15 issues of the logistics of the breakdown,
16 and unfortunately, I was tied up all week
17 dealing with this nonsense and I ended up
18 having a little bit of luck. I was able to
19 rent a vehicle and I was able to get down
20 here, a separate rental vehicle --

21 Q. Try to listen to my question.
22 My clients unfortunately have to pay for
23 this, so try to listen to my question and
24 answer it. Here is the question again.

25 Where are you staying in

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2 Upstate New York?

3 A. I'm not staying anywhere right
4 now. I don't have anywhere settled, per
5 say.

6 Q. Okay. Where did you stay when
7 you were in Chestertown?

8 A. I didn't stay in Chestertown.
9 That's where the car was stranded. I
10 wasn't staying in Chestertown. I have been
11 between like Plattsburgh, Chestertown. I
12 was up in Montreal for a day. I am not
13 staying in one place right now.

14 Q. Okay. Where did you sleep last
15 night?

16 A. In the car.

17 Q. Where did the sleep the night
18 before that?

19 A. I think it was a night in
20 Montreal.

21 Q. Where did you stay in Montreal?

22 A. I was -- I think it was
23 downtown somewhere. It is one of their
24 buildings they have down there, one of
25 their rental buildings, a hotel, Airbnb

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2 kind of things.

3 Q. What is the name of it?

4 A. Honestly, I don't know. When
5 you stay in this many places between places
6 you don't keep track of everything.

7 Q. How did you pay for that?

8 A. With money, the same way that
9 you --

10 Q. With cash or debit card?

11 A. Honestly, I don't pay attention
12 that closely to how I process payments. I
13 don't want to be dishonest about what I'm
14 doing, so I would have to go ahead and look
15 that up. If it is a very important
16 question to you, then I will find an
17 answer.

18 Q. What would you have to look at,
19 Chet?

20 A. I would have to look up how I
21 paid for it. I don't want to bear false
22 witness and sit here and lie.

23 Q. What would you have to look at,
24 Chet?

25 A. I would have to go look and

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2 see, go online and see what the payment or
3 how the payment was made.

4 Q. What would you look at online,
5 Chet?

6 A. Go to like Airbnb or Expedia or
7 whatever venue that I was using, which I
8 don't know what that is because I don't
9 have a reference point nor do I have a
10 phone or a computer with me, so there is no
11 way to know that. Is this really important
12 for you to know, like where I was staying
13 and how I paid for the place? It is a
14 hotel.

15 Q. I want to know where your bank
16 account is, Chet, so I can freeze it.
17 Where is your bank account?

18 A. My bank account, like I told
19 you before, I have one account at RBC and
20 that bank account closed. I have the
21 Santander account. That's the only other
22 account that I have right now that's
23 active. I don't have any other debit
24 cards, so it is literally that simple. It
25 is not that complicated. I told you the

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2 banks that I have. I'm not going to tell
3 you a different answer.

4 Q. So it is your testimony that
5 the only banks that you have right now are
6 Santander, correct?

7 A. Santander and I have RBC, as
8 you well know. That's closed and then I
9 have the frozen accounts over at Capital
10 One and JPMorgan, all of which I am trying
11 to make sure are unfrozen, so I can pay
12 your clients the full amount.

13 Q. I still don't understand how
14 you are going to get a million dollars to
15 pay my clients. You are going to work for
16 that money and provide consulting services
17 and then pay them; is that your testimony?

18 A. What I am saying is between
19 providing consulting services and getting
20 in touch with other third-party companies
21 that can provide the necessary services
22 that they need especially things that --
23 there are companies that provide housing
24 services, like data center services that we
25 have knowledge of that help people get into

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2 the necessary space that they need to, that
3 we know are reputable that we can trust.
4 That's the most important things because we
5 want to get them a space where they can go
6 ahead and expand and grow and we
7 basically --

8 Q. Already, Chet. When you say
9 "we", who are you referring to?

10 A. We as in the proverbial, we as
11 in a company.

12 Q. As in you?

13 A. No. The company, not the
14 proverbial --

15 Q. Well, what companies are you
16 referring to, Chet?

17 A. There are a lot of companies
18 out there that provide these kind of
19 services. You look at a company that --

20 Q. Well, you say we provide
21 services. My question, Chet, was when you
22 say we can provide services --

23 A. I'm talking about the space
24 itself. When I say, you know, services we
25 could provide as in people that work in the

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2 space of providing services, so Equinox,
3 stuff like that, like companies like
4 Internap, companies like that, very big
5 companies, established.

6 Q. What computers do you own,
7 Chet?

8 A. Right now I don't even know if
9 I have a functional laptop because of what
10 happened. I think most of that stuff has
11 been chocked up. I have to figure out if I
12 even have a warranty.

13 Q. Here is the question again,
14 Chet. What computers do you currently own?
15 List them for me.

16 A. I had a MacBook. That's dead.

17 Q. I don't want to know about
18 MacBooks that are dead. I want you to list
19 for me on the record under oath what
20 computers, tablets or phones you currently
21 own or have access to.

22 A. Well, I have one and you don't
23 want to hear about anything that was
24 affected by the power surge? For a point
25 of clarity, you don't want to hear anything

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2 that -- are you there?

3 Q. Here is the question again. It
4 is not that difficult. List for me the
5 phones, tablets, computers, laptops or hard
6 drives you currently own or have access to.

7 A. Okay. Well, like I said
8 before, I had a power surge at my place
9 which burned out most of my equipment, so I
10 don't have any desktops left. The only
11 thing I have is my -- I have to see if I
12 can get it working with Apple, but the
13 Apple warranty is no longer on it. I had
14 an Apple laptop and then I had a black --

15 Q. Not what you had, Chet. Here
16 is the question one more time.

17 A. It is not gone. I have it. It
18 is just not working right now.

19 Q. Stop. I'm going to give you
20 some instructions. I want you to list for
21 me each computer, laptop, hard drive, phone
22 or tablets that you currently own or have
23 access to, whether or not they are working.
24 I want you to list them for me.

25 A. Working or not?

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2 Q. Correct.

3 A. That's what I was asking. So I
4 have my cell phone, which I have a Nokia
5 right now. I have an old Galaxy somewhere.
6 I have to find out where it is. I'm not
7 really sure where it is at. I have two
8 laptops, a Windows and a Mac and neither
9 one of them is properly working, of course.
10 I'm still trying to get the data retrieved
11 or see if I can even fix them and then I
12 had a desktop and that desktop is not
13 working right now and it is burnt out, so I
14 don't even know if it is worth selling.

15 Q. Any other computers, laptops
16 desktops, tablets or phones that you
17 currently own or have access to; yes or no?

18 A. Not that I can think of right
19 now.

20 MR. HARWICK: We are going to
21 request that those devices be
22 produced for forensic examination.
23 We will give you a time and date for
24 that production. That production
25 will be in New York City unless you

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2 are telling me you are living
3 somewhere else.

4 Q. Where would we call your
5 residence these days?

6 A. I said I am between places.
7 Hard to say.

8 Q. Does your fiancée have her own
9 apartment?

10 A. No. She doesn't have an
11 apartment. She lives with her family when
12 she is not with me.

13 Q. Where does her family live,
14 Chet?

15 A. I think her dad lives in -- he
16 is in the Los Angeles area.

17 Q. When was the last time you saw
18 her?

19 A. I saw her the day before
20 yesterday.

21 Q. Where?

22 A. Here.

23 Q. In New York City?

24 A. Not in New York City -- in New
25 York.

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2 Q. Where in New York?

3 A. We also were in Montreal a few
4 days before that too.

5 Q. Does she have a Facebook page?

6 A. I don't know. I don't deal
7 with Facebook or that stuff. I'm sure -- I
8 think almost every girl has one, but I
9 don't know what she does with it.

10 Q. Do you own any stocks?

11 A. I have no idea. I know Morgan
12 Stanley has not done any trades and that's
13 the brokerage account that I have. I don't
14 have any other brokerage accounts to my
15 knowledge. I checked to see if there is
16 anything out there. I don't have the app
17 that I used to have, but there was an app
18 that I had that put out the stocks that I
19 had. They are either negligible or next to
20 nothing.

21 Q. Are you willing to turn over
22 the money in the Morgan Stanley account to
23 partially satisfy their judgment?

24 A. I am looking to fully satisfy
25 the settlement.

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2 Q. Are you willing to turn over
3 the money in the Morgan Stanley account to
4 my clients to partially satisfy their
5 judgments now?

6 A. That's not in line with the
7 settlement agreement. I said I would
8 settle the full settlement.

9 Q. The answer is no?

10 A. Well, it is not no. It is a
11 little more complicated than that.

12 Q. It is actually not. You can
13 authorized the wire of that money to my
14 account and that would partially satisfy my
15 client's judgment. Are you willing to do
16 that voluntarily or do I need to get the
17 sheriff involved?

18 A. No. I just need to be able to
19 open the account to do transfers.

20 Q. I can authorize the unfreezing
21 of that account for that specific purpose.
22 Are you willing to do that; yes or no,
23 Chet?

24 A. Well, once we get the
25 documentation, I would be more than happy

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2 to satisfy the full judgment.

3 Q. And you are going to satisfy
4 the full judgment by trying to provide
5 consulting services to third parties and
6 other things like that? You don't have the
7 money now; is that correct?

8 A. Well, I don't have the money in
9 my account right now because I can't move
10 anything around with my banks. You froze
11 up my bank accounts.

12 Q. Right. Where would you move
13 the money from to satisfy my client's
14 judgment?

15 A. Well, I would be paid for
16 basically services.

17 Q. Okay. So you would earn the
18 money to satisfy my client's judgment; is
19 that correct?

20 A. Yeah.

21 Q. Right, but you don't have a
22 million dollars -- Chet, this is a yes or
23 no question. Currently sitting here today,
24 do you have access to a million plus
25 dollars to satisfy my client's judgments;

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2 yes or no?

3 A. In revenue I can bring in a
4 million dollars.

5 Q. Do you have it today; yes or
6 no?

7 A. Do I have it in my pocket
8 today?

9 Q. Not in your pocket. Do you
10 have access to it in some account or in
11 some form?

12 A. No. I'm not holding it in some
13 secret account that I am not telling you
14 about. It is literally something that I'm
15 waiting to come in.

16 Q. Where is it coming in from?

17 A. It is going to be coming in
18 from any number of clients.

19 Q. Do you have contracts now with
20 these clients?

21 A. Well, it is nothing that I can
22 execute right now because I don't have the
23 ability to take in revenue.

24 Q. This is a yes or no question.
25 Remember, you are under oath, Chet. This

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2 will be read to the federal court judge.

3 Do you have contracts with clients now?

4 A. I can't execute a contract with
5 a client in good faith while I have a
6 subpoena on my account so I won't do that
7 with them until we have this lifted.

8 Q. You can't open up a new account
9 somewhere?

10 A. I spoke to you about this
11 before. Opening new accounts and trying to
12 transfer over 7 figures will cause some
13 serious issues with transfers and it can
14 get them held up for weeks on end, even
15 months. I will not go ahead and do that
16 when multiple banks told me that when you
17 transfer that kind of money without a prior
18 history --

19 Q. What money are you going to
20 transfer, Chet? I am confused. Try to
21 explain that to me. You don't have money
22 to transfer now; is that correct?

23 A. I didn't say that at all. What
24 I was saying right now was that I have this
25 already lined up. I have been waiting to

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2 go ahead and move forward, but I cannot do
3 that in good faith and ethically speaking,
4 and I don't know about legally speaking
5 because I won't be able to execute it, so
6 long as I have holds on my accounts. It is
7 really simple.

8 Q. So you think that if we lift
9 the hold on your account, you would be able
10 to enter into this new business
11 relationship, earn a million dollars and
12 pay off my clients; is that what you are
13 saying?

14 A. Yup.

15 Q. Well, when did you open up the
16 Santander account?

17 A. Last week.

18 Q. So you can open up a new
19 account, right?

20 A. It is a personal checking
21 account, but I can't put this through a
22 personal checking account.

23 Q. I'm sorry? What about a
24 personal checking account?

25 A. A personal checking account I

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2 don't use for business.

3 Q. Well, since we obtained a
4 judgment against you, you created and
5 formed and operated under Phoenix Data;
6 isn't that true?

7 A. There was three parts to that.

8 Could you clarify?

9 Q. When did you open up Phoenix
10 Data?

11 A. I don't know the exact date. I
12 would have to look that up.

13 Q. It was after we got a judgment
14 against you, correct?

15 A. What was that?

16 Q. It was after we obtained a
17 judgment against you, correct?

18 A. I don't know.

19 Q. Do you know what jurisdiction
20 that was formed in?

21 A. No, I don't have the filing
22 documents or the Articles of Incorporation.
23 I don't have any of that information.

24 Q. But you have access to them
25 online; is that correct?

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2 A. I would have to check.

3 Q. Is that through SWIFT?

4 A. I think it was SWIFT. I'm not
5 sure. I would have to check. I don't want
6 to speak out of turn. Any of these answers
7 I am more than happy to answer. I just
8 need to have the appropriate time to go
9 ahead and do the homework.

10 Q. Is there a company called
11 Phoenix Investments, as well?

12 A. Phoenix Investments? I think
13 that was something that we were trying to
14 move forward with, but it didn't work. I
15 don't know if it was ever filed.

16 Q. Does it have a website?

17 A. I don't know. Someone was
18 doing some web development. I don't know
19 if they actually created a page for it or
20 not, but they were doing web development
21 with a couple of different brands.

22 Q. Were you involved in Phoenix
23 Investments?

24 A. I don't even know if Phoenix
25 Investments was ever launched.

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2 Q. Did that have an address of 100
3 Wall Street, New York?

4 A. Like I said, how could I
5 possibly know that question when I just
6 answered the previous question? I don't
7 know. I don't know enough about it to go
8 ahead and speak with absolute confidence
9 and validity.

10 Q. When was the last time you
11 talked to your mother?

12 A. I don't know. It has been
13 months.

14 Q. I'm sorry?

15 A. It has been months. Are you
16 talking about my biological mother?

17 Q. Yes.

18 A. It has been a long time. Why?

19 Q. Were you talking about your
20 stepmother when you said you talked with
21 your mother a few months ago?

22 A. No. That's why I was trying to
23 get clarity. My father raised me. My
24 mother wasn't really in the picture when I
25 was younger, so when you say mother, I need

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2 a little more specificity.

3 Q. Has any of your family members
4 reached out to you to notify you that they
5 have been subpoenaed in this case?

6 A. No way.

7 Q. What's your mother's name?

8 A. Suzanne.

9 Q. What's her last name?

10 A. I don't know if she still uses
11 her husband's name or her ex-husband's name
12 or not, but it was Berman before.

13 Q. What's her address?

14 A. I have no idea. I don't think
15 I have that written down somewhere. I
16 haven't seen my mom in over three years
17 now. I think it has been since before
18 2019, like right around early 2019 because
19 since COVID started, it has been very hard
20 to travel.

21 Q. Have you filed for bankruptcy?

22 A. No.

23 Q. Are you aware of any criminal
24 proceedings that have been commenced or
25 started against you?

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2 A. I haven't had any confirmed.

3 Q. Okay. Have you heard of
4 possibilities?

5 A. From you.

6 Q. Have you ever been contacted by
7 the FBI?

8 A. Not to my knowledge. I talked
9 to the FBI to help them out and stuff
10 before, but it never materialized into a
11 real conversation.

12 Q. Who did you talk to at the FBI?

13 A. I don't think you heard what I
14 said. It didn't materialize into a full
15 conversation. I offered to help them out.

16 Q. Have you ever been interviewed
17 by Special Agent Blair Deil from the FBI?

18 A. No, I haven't been interviewed
19 by them, but I offered to help him.

20 Q. Would you be willing to give
21 the FBI a statement?

22 A. Absolutely not.

23 MR. HARWICK: Okay. It is
24 12:30 and we have been going for
25 about an hour, so let's take a break.

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2 What I want you to do during
3 the break, Chet, is I want you to go
4 down to your car or storage locker
5 and get your phone, whatever
6 paperwork you have with you today
7 that.

8 THE WITNESS: I don't have any
9 paperwork with me today. I didn't
10 bring anything with me.

11 MR. HARWICK: Go get your phone
12 and your wallet and we will come back
13 at noon. That's going to give you
14 enough time to get that.

15 THE WITNESS: What time is it
16 now? You said come back at noon?

17 MR. HARWICK: Or before, if you
18 can get back before then.

19 THE COURT REPORTER: It is
20 12:30.

21 MR. HARWICK: Oh, I'm sorry.
22 Strike that. We will come back at
23 1:00 and I want you to bring your
24 phone with you and your wallet and
25 any other financial documents or

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2 computers or anything that you have
3 with you in your car.

4 THE WITNESS: I don't.

5 MR. HARWICK: I want you to
6 take a picture of the license plate
7 of your car and you have the rental
8 agreement in the car or some
9 insurance info in the car, don't you?

10 THE WITNESS: I think it is
11 done digitally, but I can check and
12 see.

13 MR. HARWICK: So bring that all
14 back with you. We will take a break
15 until 1:00, okay?

16 THE WITNESS: Until 1:00? I
17 don't think you understand how far
18 away this stuff is.

19 MR. HARWICK: Come back when
20 you come back.

21 What did you just pick up
22 there, Chet? What was that?

23 THE WITNESS: This is my
24 medicine.

25 MR. HARWICK: What kind of

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2 medicine?

3 THE WITNESS: My medicine for
4 my CMT -- my neuropathy.

5 MR. HARWICK: Why don't you go
6 to your car and bring back with you
7 any documents that you have that are
8 in response to my subpoena or demands
9 including the rental agreement or any
10 information that you have about the
11 rental car that you have. I want to
12 see your phone and I want to see your
13 wallet, okay? What else is in your
14 car?

15 THE WITNESS: I have my wallet
16 in my car. There is not much in it.
17 It has my driver's license -- well,
18 not my driver's license.

19 MR. HARWICK: Is your
20 girlfriend or fiancée with you today?

21 THE WITNESS: No. We are
22 apart.

23 MR. HARWICK: I'm sorry?

24 THE WITNESS: We are apart.

25 MR. HARWICK: Where is she

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2 today?

3 THE WITNESS: I don't know. We
4 are just doing a little break right
5 now.

6 MR. HARWICK: Okay. Go down
7 and get your phone, Chet. Get your
8 wallet.

9 THE WITNESS: I can get my
10 phone. I don't have anything else
11 with me, so I don't know what else I
12 am supposed to bring.

13 MR. HARWICK: Well, you have
14 your wallet. I want to see your
15 wallet. Bring it all back.

16 THE WITNESS: Fine.

17 MR. HARWICK: Let's adjourn
18 until 1:00, please.

19 THE VIDEOGRAPHER: We are going
20 off the record at 12:33 p.m.

21 (Whereupon, a short recess was
22 taken.)

23 THE VIDEOGRAPHER: Back on the
24 record at 1:30 p.m.

25 MR. HARWICK: Again, this is

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2 John Harwick. We are back on the
3 record. The time is now 1:31 p.m.

4 We had taken a break from this
5 deposition at approximately 12:30
6 p.m. to allow Mr. Stojanovich to go
7 to his rental car, get a copy of his
8 rental agreement, a copy of his --
9 not get a copy, but rather retrieve
10 his wallet and to also retrieve his
11 phone, which we intended to examine
12 as part of this deposition along with
13 his wallet. The time is now 1:31.
14 Mr. Stojanovich has not come back and
15 we made it expressly clear on the
16 record that we were to begin again at
17 1:00 p.m.

18 For the record, I did try
19 calling his number that he had given
20 us on the record here. That number
21 is area code 310-824-3903. When I
22 dialed that number, it rang and rang.
23 It went to voicemail and the
24 voicemail box was full, so I was
25 unable to leave a message.

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1 C. STOJANOVICH

2 I will attempt to continue this
3 deposition via communication through
4 Chet by phone and e-mail and we will
5 be pursuing the remedy of civil
6 and/or criminal contempt for his
7 failure to comply with the court's
8 directive with the lawfully issued
9 subpoenas and with the other requests
10 that I have made at this deposition
11 and at his former deposition.

12 So with that, we are going to
13 close this record. I would ask the
14 videographer to confirm that
15 Mr. Stojanovich is not in the room;
16 is that correct?

17 THE VIDEOGRAPHER: No, he is
18 not in the room.

19 MR. HARWICK: Okay.

20 Would it be possible for you to
21 go and check the waiting room
22 outside? I'm not familiar with the
23 offices, but is there a waiting room
24 to see if he is out in the hall or
25 anything?

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2 THE VIDEOGRAPHER: Yeah, I will
3 take a look.

4 MR. HARWICK: Let's just allow
5 for that and we will go off the
6 record for now.

7 (Pause.)

8 THE VIDEOGRAPHER: He is not
9 there.

10 MR. HARWICK: So you have gone
11 out in the hallway in the waiting
12 area and you were unable to locate
13 Mr. Stojanovich?

14 THE VIDEOGRAPHER: Yes.

15 MR. HARWICK: Again, what's
16 your name for the record?

17 THE VIDEOGRAPHER: Matthew
18 Chin-Quee.

19 MR. HARWICK: What company are
20 you with?

21 THE VIDEOGRAPHER: Veritext.

22 MR. HARWICK: Got it. Great.
23 We will conclude.

24 I am reserving our rights and I
25 thank everybody for participating.

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2 THE VIDEOGRAPHER: This marks
3 the end of the deposition. We are
4 going off the record at 1:34 p.m.

5 (Whereupon, at 1:34 P.M., the
6 Examination of this witness was
7 concluded.)

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1 C. STOJANOVICH

2 D E C L A R A T I O N

3

4 I hereby certify that having been
5 first duly sworn to testify to the truth, I
6 gave the above testimony.

7

8 I FURTHER CERTIFY that the foregoing
9 transcript is a true and correct transcript
10 of the testimony given by me at the time
11 and place specified hereinbefore.

12

13

14

15 -----
16 CHET STOJANOVICH

17

18 Subscribed and sworn to before me
19 this _____ day of _____ 20_____.
20

21

22 -----
23 NOTARY PUBLIC
24

25

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1 C. STOJANOVICH
2 E X H I B I T S
3

4 EXHIBIT EXHIBIT PAGE
5 NUMBER DESCRIPTION
6 (None)

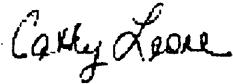
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9 I N D E X
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11 EXAMINATION BY PAGE
12 MR. HARWICK 5

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15 INFORMATION AND/OR DOCUMENTS PAGE
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21
22 QUESTIONS MARKED FOR RULINGS
23 PAGE LINE QUESTION
24 (None)
25

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1 C. STOJANOVICH
2 C E R T I F I C A T E
3
4 STATE OF NEW YORK)
5 COUNTY OF NASSAU) : SS.:
6
7 I, CATHY LEONE, a Notary Public for
8 and within the State of New York, do hereby
9 certify:
10 That the witness whose examination is
11 hereinbefore set forth was duly sworn and
12 that such examination is a true record of
13 the testimony given by that witness.
14 I further certify that I am not
15 related to any of the parties to this
16 action by blood or by marriage and that I
17 am in no way interested in the outcome of
18 this matter.
19 IN WITNESS WHEREOF, I have hereunto
20 set my hand this 14th day of March 2022.
21
22 
23
24 CATHY LEONE
25

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1 ERRATA SHEET
2 VERITEXT/NEW YORK REPORTING, LLC

3 CASE NAME: Holmes, Alex v. Chet Mining Company LLC, Et al

4 DATE OF DEPOSITION: 3/4/2022

5 WITNESSES' NAME: Chet Stojanovich

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22 _____
23 Chet Stojanovich

24 SUBSCRIBED AND SWORN TO BEFORE ME
25 THIS ____ DAY OF _____, 20 ____.

26 _____
27 (NOTARY PUBLIC)

28 _____
29 MY COMMISSION EXPIRES:

[& - apart]

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[car - counsel]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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